

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

ZHEN ZHOU WU a/k/a ALEX WU

CASE NUMBER: 2008-mj-0501-RBC

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On the dates specified below, in the District of Massachusetts and elsewhere, ZHEN ZHOU WU a/k/a ALEX WU, defendant herein, did (Track Statutory Language of Offenses)

(a) on or about March 10, 2003, June 25, 2004, March 11, 2005, September 15, 2006, March 15, 2007, and March 17, 2008, willfully make and subscribe U.S. Corporation Income Tax Returns which were verified by a written declaration that they were made under the penalties of perjury and were filed with the Internal Revenue Service, which said corporate income tax returns he did not believe to be true and correct as to every material matter, in violation of 26 U.S.C. §7206(1); (b) in a matter within the jurisdiction of the executive branch of the Government of the United States, on or about June 2004, March 2005, September 2006, March 2007, and March 2008, make materially false, fictitious, or fraudulent statements and representations of material fact to the Internal Revenue Service, in violation of 18 U.S.C. §1001; and (c) beginning no later than July 2005 and continuing through in or about December 2008, willfully and knowingly violate Executive Order 13222 and the Export Administration Regulations in that he did unlawfully conspire, combine, confederate and agree with others to file, and cause the filing, of false export control documents, including Shipper's Export Declarations,

in violation of Title 50 United States Code, Section 1705(a)

I further state that I am a Special Agent, IRS-CI and that this complaint is based on the following facts:

See attached Affidavit of ATF Special Agent Jason Ryan.

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

Signature of Complainant

Special Agent, IRS-CI

Sworn to before me and subscribed in my presence,

Date

ROBERT B. COLLINGS
United States Magistrate Judge
Name and Title of Judicial Officer

Boston, Massachusetts
City and State

Signature of Judicial Officer

